

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

STATE OF ALASKA, *ex. rel.*

Attorney General BRUCE M. BOTELHO,

STATE OF CONNECTICUT, *ex. rel.*

Attorney General RICHARD BLUMENTHAL,

COMMONWEALTH OF KENTUCKY, *ex. rel.*

Attorney General A.B. CHANDLER, III,

STATE OF OHIO, *ex. rel.*

Attorney General BETTY D. MONTGOMERY,

STATE OF OKLAHOMA, *ex. rel.*

Attorney General W.A. DREW EDMONDSON,

STATE OF SOUTH CAROLINA, *ex. rel.*

Attorney General CHARLES M. CONDON,

STATE OF UTAH, *ex. rel.*

Attorney General MARK L. SHURTLEFF,

Plaintiffs,

v.

HOFFMANN-LA ROCHE INC.,

ROCHE VITAMINS INC.,

AVENTIS ANIMAL NUTRITION, S.A.,

DAIICHI PHARMACEUTICAL CO., LTD.,

EISAI CO., LTD.,

TAKEDA CHEMICAL INDUSTRIES, LTD., and

BASF CORPORATION,

Defendants.

**STIPULATION**

**CIVIL ACTION NO. \_\_\_\_\_**

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

A. The Court has jurisdiction over the subject matter of this action. The Court also has

jurisdiction over each of the parties hereto solely for the purposes of enforcing the Final Judgment and Consent Decree and the Settlement Agreement, and venue in this action is proper in the District of Columbia.

B. The parties to this Stipulation consent that a Final Judgment and Consent Decree in the form attached (as Attachment A) may be filed and entered by the Court upon the motion of any party or the Court's own motion without further notice to any party or other proceedings.

C. The Defendants admit no allegations in the Complaint, except for those pertaining to jurisdiction and venue, and solely for the purposes of enforcing the Final Judgment and Consent Decree and the Settlement Agreement.

DATED: July \_\_, 2001

**FOR THE PLAINTIFF STATES**

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Attorney General of Utah

By: \_\_\_\_\_  
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By: \_\_\_\_\_  
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**FOR THE DEFENDANTS**

**AVENTIS ANIMAL NUTRITION S.A**

By:

John M. Majoras  
JONES, DAY, REAVIS & POGUE,  
on behalf of Aventis Animal Nutrition S A.

**BASF CORPORATION**

By:

Tyrone C. Fahner  
MAYER, BROWN & PLATT,  
on behalf of BASF Corporation

**DAIICHI PHARMACEUTICAL CO., LTD.**

By:

Michael L. Denger  
GIBSON, DUNN & CRUTCHER, LLP  
on behalf of Daiichi Pharmaceutical Co., Ltd

**EISAI CO., LTD.**

By:

D. Stuart Meiklejohn  
SULLIVAN & CROMWELL,  
on behalf of Eisai Co., Ltd.

**HOFFMAN-LA ROCHE INC. & ROCHE  
VITAMINS INC.**

By:

Jacqueline Denning  
ARNOLD & PORTER,  
on behalf of Hoffmann-La Roche Inc. & Roche  
Vitamins Inc.

**TAKEDA CHEMICAL INDUSTRIES, LTD.**

By:

Lawrence Byrne  
SQUADRON, ELLENOFF, PLESENT &  
SHEINFELD, LLP,  
on behalf of Takeda Chemical Industries, Ltd.